



Montana Environmental Trust Group, LLC  
Trustee of the Montana Environmental Custodial Trust  
PO Box 1230, East Helena, Montana 59635  
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**By Electronic Mail**

December 21, 2017

Betsy Burns  
RCRA Project Officer and CERCLA RPM  
US Environmental Protection Agency—Region 8  
Montana Office  
10 West 15th Street, Suite 3200  
Helena, Montana 59626

RE: Final 2018 Budget for East Helena Cleanup (EHCU) Account  
Montana Environmental Custodial Trust

Dear Betsy:

Pursuant to ¶16.g of the Consent Decree and Settlement Agreement Regarding the Montana Sites (the Settlement Agreement), the Montana Environmental Trust Group, LLC, Trustee of the Montana Environmental Custodial Trust (the Custodial Trust), hereby submits the final East Helena Cleanup (EHCU) Account budget for environmental actions to be performed in 2018 (the Final 2018 Budget). The Final 2018 Budget for the EHCU Account is submitted to the United States Environmental Protection Agency (EPA) as Lead Agency for the East Helena Designated Property.

- Table 1—Summarizes the Final 2018 Budget
- Table 2—Details the Final 2018 Budget (to the Level 5 Cost Center)
- Table 3—Provides an estimate of the projected expenditures for the first quarter of 2019 (pursuant to ¶16.g of the Settlement Agreement)

The Custodial Trust is requesting EPA approval for a 2018 budget of \$3,572,900 and conditional approval of \$6,859,700 for certain 2018 environmental actions that must be individually approved by EPA pursuant to the EHCU Account budget protocols. Consistent with the budget protocols, the Custodial Trust is accountable to: the Level 1 budget for Cost Centers A through I and K through T; and the Level 3 budget for Cost Center for J.

Thank you for your consideration and approval of the Final 2018 Budget and best wishes for a happy New Year.

Sincerely,



Montana Environmental Trust Group, LLC

Trustee of the Montana Environmental Custodial Trust

By: Greenfield Environmental Trust Group, Inc., Member

By: Jennifer Roberts, Director of Financial Affairs

#### Attachments

cc: Cindy Brooks—Custodial Trust  
Chuck Figur—EPA  
Lauri Gorton—Custodial Trust  
Joe Vranka—EPA  
Marc Weinreich—Custodial Trust

**Table 1 - Montana Environmental Custodial Trust East Helena Clean-Up Account - 2018 Final Budget  
East Helena 2018 Budget Summary**

Level 1 Cost Centers		Level 2 Cost Centers	Cost Code	2017 Original Budget	2017 EPA Approved Budget as of 9/15/2017	2017 Actual Costs as of 9/30/2017	2018 Final Budget
B	General Site Operations & Maintenance		II.B	\$108,100	\$108,100	\$33,507	\$108,500
C	Waste Disposal		II.C	\$6,300	\$6,300	\$0	\$0
D	Slag Reprocessing		II.D	\$11,800	\$11,800	\$0	\$0
E	Tenants		II.E	\$5,700	\$5,700	\$0	\$0
F	RCRA/CAMU Compliance		II.F	\$566,300	\$566,300	\$25,292	\$721,600
I	Risk Assessments		II.I	\$50,000	\$50,000	\$1,907	\$0
J	RCRA Corrective Action Implementation	<b>1. South Plant Hydraulic Control (SPHC) IM</b>					
		a. Design	II.J.1.a	\$289,000	\$289,000	\$0	\$289,000
		b. Construction	II.J.1.b	\$716,500	\$603,500	\$497,594	\$0
		<b>Subtotal SPHC IM</b>	<b>II.J.1</b>	<b>\$1,005,500</b>	<b>\$892,500</b>	<b>\$497,594</b>	<b>\$289,000</b>
		<b>2. ET Cover System IM</b>					
		a. Design	II.J.2.a	\$16,500	\$16,500	\$0	\$0
		b. Construction	II.J.2.b	\$16,000	\$16,000	\$6,701	\$0
		<b>Subtotal ET Cover System IM</b>	<b>II.J.2</b>	<b>\$32,500</b>	<b>\$32,500</b>	<b>\$6,701</b>	<b>\$0</b>
		<b>4. IM/RCRA Support</b>	<b>II.J.4</b>	<b>\$130,900</b>	<b>\$130,900</b>	<b>\$111,378</b>	<b>\$84,000</b>
		<b>6. Corrective Measures Implementation</b>					
		a. CMI Work Plan	II.J.6.a	\$150,000	\$150,000	\$0	\$150,000
		b. Final Remedy	II.J.6.b	\$15,500	\$0	\$0	\$5,220,000
		c. Corrective Measures O&M	II.J.6.c	\$550,500	\$550,500	\$60,085	\$828,400
		d. 2017 CAMP/Performance	II.J.6.d	\$415,300	\$415,300	\$149,458	\$353,300
		e. Long term Technical	II.J.6.e	\$50,000	\$50,000	\$1,250	\$50,000
		f. Residential Well Abandonment	II.J.6.f	\$176,000	\$176,000	\$0	\$176,000
		<b>Subtotal CMI</b>	<b>II.J.6</b>	<b>\$1,357,300</b>	<b>\$1,341,800</b>	<b>\$210,793</b>	<b>\$6,777,700</b>
		<b>7. Long-term Stewardship and O&amp;M</b>	<b>II.J.7</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	<b>\$1,671,000</b>
		<b>Grand Total RCRA Corrective Action Implementation</b>	<b>II.J</b>	<b>\$2,526,200</b>	<b>\$2,397,700</b>	<b>\$826,466</b>	<b>\$8,821,700</b>
K	Documents & Records		II.K	\$39,300	\$39,300	\$8,348	\$18,000
M	CERCLA Compliance		II.M	\$34,400	\$34,400	\$6,275	\$34,400
N	Financial Affairs		II.N	\$90,000	\$30,000	\$20,550	\$90,000
O	Redevelopment		II.O	\$15,000	\$15,000	\$2,508	\$15,000
P	Community Relations		II.P	\$38,500	\$38,500	\$4,975	\$54,500
R	Legal Support		II.R	\$56,200	\$56,200	\$22,568	\$56,200
T	Trust Project Management		II.T	\$512,700	\$512,700	\$182,419	\$512,700
<b>Total Budget - East Helena Cleanup Account:</b>				<b>\$4,060,500</b>	<b>\$3,872,000</b>	<b>\$1,134,815</b>	<b>\$10,432,600</b>
<b>Total Amounts That Require Prior EPA Approval:</b>				<b>\$225,500</b>			<b>\$6,859,700</b>
<b>Final Budget East Helena Cleanup Account Excluding Amounts That Require Prior EPA Approval:</b>				<b>\$3,835,000</b>			<b>\$3,572,900</b>

Table 2 - Montana Environmental Custodial Trust East Helena Clean-Up Account - 2018 Final Budget								
December 21, 2017								
Level 1 Cost Centers	Level 2 Cost Centers	Cost Code	2017 Original Budget	2017 EPA Approved Budget as of 9/15/2017	2017 Actual Costs as of 9/30/2017	2018 Final Budget	Comments	
						2018 Budget Line Items Requiring Prior EPA Approval	Budget line items highlighted in blue have not been fully scoped, costed and/or financially committed by the Custodial Trust. Prior to incurring any charges or making contractual commitments in connection with these activities, the Custodial Trust will secure the prior written approval of EPA.	
B	General Site Operations & Maintenance	1. Operations & Maintenance	II.B.1	\$59,500	\$59,500	\$20,812	\$59,900	Level funding from 2017.
		2. Office Operations	II.B.2	\$5,000	\$5,000	\$1,235	\$5,000	Level funding from 2017.
		3. Health & Safety	II.B.3	\$14,100	\$14,100	\$3,969	\$14,100	Level funding from 2017.
		6. Emergency Response	II.B.6	\$20,000	\$20,000	\$0	\$20,000	Level funding from 2017.
		7. Site Office	II.B.7	\$9,500	\$9,500	\$7,491	\$9,500	Level funding from 2017.
		Subtotal Site O&M - II.B		\$108,100	\$108,100	\$33,507	\$108,500	
C	Waste Disposal	3. Other Disposal	II.C.3	\$6,300	\$6,300	\$0	\$0	No disposal costs were incurred in 2017. Recommend retiring Cost Center.
		Subtotal Waste Disposal - II.C		\$6,300	\$6,300	\$0	\$0	
D	Slag Reprocessing	1. Slag Pile Re-Processing	II.D.1	\$11,800	\$11,800	\$0	\$0	No slag reprocessing costs have been incurred since 2015. Future costs, if any, will be captured in Cost Center II.B or II.T. Recommend retiring Cost Center.
		Subtotal Slag Reprocessing - II.D		\$11,800	\$11,800	\$0	\$0	
E	Tenants	4. Other Tenants/Land Use Matters	II.E.4	\$5,700	\$5,700	\$0	\$0	No tenant costs have been incurred since 2015. Future costs, if any, will be captured in Cost Center II.B or II.T. Recommend retiring Cost Center.
		Subtotal Tenants - II.E		\$5,700	\$5,700	\$0	\$0	
F	RCRA/CAMU Compliance	1. Reporting	II.F.1	\$2,000	\$2,000	\$0	\$2,000	Level funding from 2017.
		2. Inspections	II.F.2	\$2,000	\$2,000	\$0	\$2,000	Level funding from 2017.
		5. CAMU O&M/Leachate Collection & Disposal	II.F.5	\$208,300	\$208,300	\$18,856	\$490,900	2018 budget covers O&M for CAMU #1 and #2, including: mowing; weed control; vegetation and leak detection; and estimated cost for off-site disposal of ~100k gallons (compared to 2017 budget of ~50k
		7. CAMU Leachate Transfer Station	II.F.7	\$354,000	\$354,000	\$6,436	\$226,700	2018 budget is based on estimated cost to design and construct CAMU leachate collection and transfer station.
		Subtotal RCRA Compliance - II.F		\$566,300	\$566,300	\$25,292	\$721,600	
I	Risk Assessments	1. HHRA	II.I.1	\$25,000	\$25,000	\$968	\$0	Work was completed as part of CMS. Recommend retiring Cost Center.
		2. BERA	II.I.2	\$25,000	\$25,000	\$939	\$0	Work was completed as part of CMS. Recommend retiring Cost Center.
		Subtotal Risk Assessments - II.I		\$50,000	\$50,000	\$1,907	\$0	
J	RCRA Corrective Action Implementation	1. South Plant Hydraulic Control (SPHC) IM	II.J.1					
		a. SPHC IM Design		II.J.1.a				
		7. PPC Realignment Permitting	II.J.1.a.7	\$289,000	\$289,000	\$0	\$289,000	2018 budget was based on estimated cost to construct South Montana Ave extension (to County gravel road standard).
		Subtotal SPHC IM Design - II.J.1.a		\$289,000	\$289,000	\$0	\$289,000	
		b. SPHC IM Construction		II.J.1.b				
		9. PPC Realignment Construction	II.J.1.b.9	\$566,500	\$566,500	\$461,117	\$0	Work was completed in 2017. Recommend retiring Cost Center.
		10. Insurance	II.J.1.b.10	\$150,000	\$37,000	\$36,477	\$0	Project specific insurance is not required because construction was completed in 2017. Recommend retiring Cost Center.
		Subtotal SPHC IM Construction - II.J.1.b		\$716,500	\$603,500	\$497,594	\$0	
		Subtotal SPHC IM Design and Construction - II.J.1		\$1,005,500	\$892,500	\$497,594	\$289,000	SPHC IM O&M included in Cost Center II.J.6.c.1
		2. ET Cover System IM		II.J.2				
		a. ET Cover System IM Design		II.J.2.a				
		4. Stormwater Management/Permitting	II.J.2.a.4	\$16,500	\$16,500	\$0	\$0	ET Cover System design was completed. Recommend retiring Cost Center.
		Subtotal ET Cover System IM Design - II.J.2.a		\$16,500	\$16,500	\$0	\$0	
		b. ET Cover System IM Construction		II.J.2.b				
		9. ET Cover, ICS 2 and Phase 3 Demo Construction	II.J.2.b.9	\$16,000	\$16,000	\$6,701	\$0	ET Cover System construction was completed in 2017. Recommend retiring Cost Center.
		Subtotal ET Cover System IM Construction - II.J.2.b		\$16,000	\$16,000	\$6,701	\$0	
		Subtotal ET Cover System IM - II.J.2		\$32,500	\$32,500	\$6,701	\$0	ET Cover System IM O&M included in Cost Center II.J.6.c.1
		4. IM/RCRA Support		II.J.4				
		8. CMS Report Preparation	II.J.4.b.8	\$130,900	\$130,900	\$111,378	\$84,000	2018 budget is based on estimated cost to: finalize CMS report after receipt of comments from beneficiaries and public; prepare the statement of basis for CMs; and perform limited groundwater modeling.
		Subtotal IM/RCRA Support - II.J.4		\$130,900	\$130,900	\$111,378	\$84,000	

Level 1 Cost Centers	Level 2 Cost Centers	Cost Code	2017 Original Budget	2017 EPA Approved Budget as of 9/15/2017	2017 Actual Costs as of 9/30/2017	2018 Final Budget	Comments	
						2018 Budget Line Items Requiring Prior EPA Approval	Budget line items highlighted in blue have not been fully scoped, costed and/or financially committed by the Custodial Trust. Prior to incurring any charges or making contractual commitments in connection with these activities, the Custodial Trust will secure the prior written approval of EPA.	
J	RCRA Corrective Action Implementation	6. Corrective Measure Implementation	II.J.6					
		a. CMI Work Plan	II.J.6.a	\$150,000	\$150,000	\$0	\$150,000	2018 budget is level funded from 2017 budget and covers estimated costs to prepare CMI Work Plan (per First Modification to RCRA Consent Decree), including: outline of CM design, construction, implementation schedule; and preparation of long-term O&M and monitoring plan for final CMs to be approved by EPA.
		b. Final Remedy Construction/Implementation	II.J.6.b					
		1. Design	II.J.6.b.1	\$15,500	\$0	\$0	\$220,000	2018 budget is based on estimated cost to design slag pile remedy (including costs to support limited field investigations).
		2. Construction/Implementation	II.J.6.b.2	\$0	\$0	\$0	\$5,000,000	2018 budget is placeholder based on the estimate to procure construction bids and begin slag pile re-grading.
		Subtotal Final Remedy Construction - II.J.6.b		\$15,500	\$0	\$0	\$5,220,000	
		c. Corrective Measures O&M	II.J.6.c					
		1. PPC/PPC Bypass O & M	II.J.6.c.1	\$257,500	\$257,500	\$19,039	\$440,200	2018 budget includes estimated costs to: repair damage from spring run-off; monitor and inspect stream flows, vegetation growth and animal browsing; control weeds; re-seed and re-plant vegetation; and prepare O&M manual. Note: A portion of PPC O&M costs for 2017 were included in Cost Center II.J.1.b.9 (PPC Realignment Construction).
		2. ET Cover System O & M	II.J.6.c.2	\$162,800	\$162,800	\$41,046	\$190,000	2018 budget is based on estimated cost for: monthly routine inspections; semi-annual technical inspections; special inspections after extreme weather or other events; repairs to ET Cover; management and reporting; and miscellaneous support for setup, training and implementing O&M plan.
		3. Speiss-Dross Slurry Wall O&M	II.J.6.c.3	\$60,700	\$60,700	\$0	\$0	Work was completed in 2016. Recommend retiring Cost Center.
		4. East Valley Controlled Groundwater Area (EVCGWA)	II.J.6.c.4	\$69,500	\$69,500	\$0	\$69,500	2018 budget based on estimated costs for: assisting EVCGWA Technical Advisory Group (TAG) with implementation of rules; providing routine groundwater information/updates to TAG and other stakeholders; and other activities (including revised data collection plans) to support implementation of the EVCGWA.
		5. Wilson Ditch O&M: Design and Implementation	II.J.6.c.5	\$0	\$0	\$0	\$128,700	2018 budget based on estimated costs for: clearing vegetation; excavating and disposing of 12" material; backfilling with clean soil; and seeding/vegetating former ditch.
		Subtotal Corrective Measures O&M - II.J.6.c		\$550,500	\$550,500	\$60,085	\$828,400	
		d. 2017 CAMP/Performance Monitoring	II.J.6.d					
		1. 2017 CAMP	II.J.6.d.1	\$312,800	\$312,800	\$141,100	\$250,800	2018 budget based on estimated costs for: sampling and data collection; ongoing data review/analysis; evaluation and distribution of groundwater/surface water quality data; ongoing updates to trending data for monitoring wells; CAMP laboratory analysis; database management activities; and well survey and repairs.
		2. GW Strategy and Technical Support	II.J.6.d.2	\$102,500	\$102,500	\$8,358	\$102,500	2018 budget is level funded from 2017.
		Subtotal CAMP/Performance Monitoring - II.J.6.d		\$415,300	\$415,300	\$149,458	\$353,300	
		e. Long term Technical Planning/Support	II.J.6.e	\$50,000	\$50,000	\$1,250	\$50,000	2018 budget is level funded from 2017 and includes costs to support CMI, financial forecasting and other strategy and planning technical tasks.
		f. Residential Well Abandonment	II.J.6.f	\$176,000	\$176,000	\$0	\$176,000	2018 budget is level funded from 2017 and includes costs to abandon 7 private wells in East Helena.
		Subtotal Corrective Measures Implementation - II.J.6		\$1,357,300	\$1,341,800	\$210,793	\$6,777,700	
		7. Long-term Stewardship and O&M	II.J.7					
		a. Greenway Project	II.J.7.a	\$0	\$0	\$0	\$1,671,000	2018 budget based on Prickly Pear Land Trust estimate for the portion of the Greenway Project costs to be paid from East Helena Cleanup Account. Budget assumes that the balance of Greenway Project costs will be funded by the NRD Program and/or others.
		Subtotal Long-term Stewardship and O&M - II.J.7		\$0	\$0	\$0	\$1,671,000	
		Total All RCRA Corrective Action Implementation Design & Construction - II.J		\$2,526,200	\$2,397,700	\$826,466	\$8,821,700	

Level 1 Cost Centers	Level 2 Cost Centers	Cost Code	2017 Original Budget	2017 EPA Approved Budget as of 9/15/2017	2017 Actual Costs as of 9/30/2017	2018 Final Budget	Comments	
						2018 Budget Line Items Requiring Prior EPA Approval	Budget line items highlighted in blue have not been fully scoped, costed and/or financially committed by the Custodial Trust. Prior to incurring any charges or making contractual commitments in connection with these activities, the Custodial Trust will secure the prior written approval of EPA.	
K	Documents & Records	1. System Set-up	II.K.1	\$21,300	\$21,300	\$0	\$0	2018 budget assumes no additional upgrades to on-line/virtual document system (Alfresco).
		3. System Maintenance	II.K.3	\$18,000	\$18,000	\$8,348	\$18,000	2018 budget is level funded from 2017.
		Subtotal Documents & Records - II.K		\$39,300	\$39,300	\$8,348	\$18,000	
M	CERCLA Compliance	1. CERCLA/ROD Compliance	II.M.X	\$34,400	\$34,400	\$6,275	\$34,400	2018 budget is level funded from 2017 and includes costs for: East Fields soil repository erosion control measures; management and maintenance of mini-soil repository; and weed control.
		Subtotal CERCLA Compliance - II.M		\$34,400	\$34,400	\$6,275	\$34,400	
N	Financial Affairs	1. CPA Services	II.N.1	\$30,000	\$30,000	\$20,550	\$30,000	Level funded from 2017.
		2. Design and Construction Audit Service	II.N.4	\$60,000	\$0	\$0	\$60,000	2018 budget is based on estimated cost for audit of engineering design/construction contractor. Note: Any cost for beneficiary-requested audit per Section 6.1 of Trust Agreement is covered by Administrative Account Budget.
		Subtotal Financial Affairs - II.N		\$90,000	\$30,000	\$20,550	\$90,000	
O	Redevelopment	1. Redevelopment Plans	II.O.1	\$0	\$0	\$0	\$0	Budget assumes no activity in 2017. Recommend retiring cost center.
		2. Redevelopment Technical Support	II.O.2	\$10,000	\$10,000	\$2,508	\$10,000	Budget assumes limited technical planning support for 2018.
		3. Redevelopment Issues	II.O.3	\$5,000	\$5,000	\$0	\$5,000	Budget assumes limited technical/logistical support to address redevelopment/local land use regulations and issues.
		Subtotal Redevelopment - II.O		\$15,000	\$15,000	\$2,508	\$15,000	
P	Community Relations	1. General Meetings	II.P.1	\$3,000	\$3,000	\$0	\$3,000	Level funded from 2017.
		2. RCRA Annual Public Meeting	II.P.2	\$3,000	\$3,000	\$0	\$3,000	Level funded from 2017.
		3. East Helena Website	II.P.3	\$7,500	\$7,500	\$0	\$7,500	Level funded from 2017.
		4. Community Involvement/Relations Plan	II.P.4	\$0	\$0	\$0	\$0	No costs anticipated in 2017.
		5. Other CR activities	II.P.5	\$25,000	\$25,000	\$4,975	\$41,000	Budget includes costs for: updated PPC video; routine aerial photography; periodic fact sheets, newsletters and updates on project status (including costs for <i>Prickly Pear Junction</i> reports); logistical and other support for community tours and meetings; and support for UM East Helena GW project.
		Subtotal Community Relations - II.P		\$38,500	\$38,500	\$4,975	\$54,500	
R	Legal Support	1. Outside Council Fees & Expenses	II.R.1	\$15,000	\$15,000	\$380	\$15,000	Level funded from 2017.
		2. In-house Legal Services	II.R.2	\$41,200	\$41,200	\$22,188	\$41,200	Level funded from 2017.
		Subtotal Legal Support - II.R		\$56,200	\$56,200	\$22,568	\$56,200	
T	Trust Project Management	4. GW and PPC Project Management	II.T.4	\$56,000	\$56,000	\$38,160	\$56,000	Level funded from 2017.
		6. Compliance Manager	II.T.6	\$13,700	\$13,700	\$11,771	\$13,700	Level funded from 2017.
		7. Operations Manager	II.T.7	\$41,100	\$41,100	\$10,329	\$41,100	Level funded from 2017.
		8. Operations Support Specialist	II.T.8	\$27,000	\$27,000	\$3,095	\$27,000	Level funded from 2017.
		9. Project Controls/Financial Affairs Coordinator	II.T.9	\$115,400	\$115,400	\$25,937	\$115,400	Level funded from 2017.
		11. Trustee Management EH Clean Up	II.T.11	\$218,000	\$218,000	\$72,595	\$141,600	Budget assumes: 0.30 FTE in 2017 for managing principal. Note: 2018 RCRA Director costs are captured under new Cost Center II.T.14.
		12. Trustee Land Use & Re-use	II.T.12	\$29,500	\$29,500	\$20,532	\$29,500	Level funded from 2017.
		13. Trustee Travel and Directs	II.T.13	\$12,000	\$12,000	\$0	\$12,000	Level funded from 2017.
		14. Project Management/ET Stewardship Oversight	II.T.14	\$0	\$0	\$0	\$76,400	Budget assumes 0.20 FTE for RCRA Director (for costs previously budgeted in cost center II.T.11).
		Subtotal Trustee Management - II.T		\$512,700	\$512,700	\$182,419	\$512,700	
Total Budget - East Helena Cleanup Account:			\$4,060,500	\$3,872,000	\$1,134,815	\$10,432,600		
Total Amounts That Require Prior EPA Approval:			\$225,500			\$6,859,700		
Final Budget East Helena Cleanup Account Excluding Amounts That Require Prior EPA Approval:			\$3,835,000			\$3,572,900		

**Table 3 - Montana Environmental Custodial Trust East Helena Clean-Up Account - 1Q2019 Estimate**

**December 21, 2017**

Level 1 Cost Centers		Level 2 Cost Centers	Cost Code	2018 Final Budget	First Quarter 2019 Estimate
				2018 Budget Line Items Requiring Prior EPA Approval	2018 Budget Line Items Requiring Prior EPA Approval
<b>B</b>	<b>General Site Operations &amp; Maintenance</b>	1. Operations & Maintenance	II.B.1	\$59,900	\$14,975
		2. Office Operations	II.B.2	\$5,000	\$1,250
		3. Health & Safety	II.B.3	\$14,100	\$3,525
		6. Emergency Response	II.B.6	\$20,000	\$5,000
		7. Site Office	II.B.7	\$9,500	\$2,375
		<b>Subtotal Site O&amp;M - II.B</b>		<b>\$108,500</b>	<b>\$27,125</b>
		3. Other Disposal	II.C.3	\$0	\$0
		<b>Subtotal Waste Disposal - II.C</b>		<b>\$0</b>	<b>\$0</b>
<b>D</b>	<b>Slag Reprocessing</b>	1. Slag Pile Re-Processing	II.D.1	\$0	\$0
		<b>Subtotal Slag Reprocessing - II.D</b>		<b>\$0</b>	<b>\$0</b>
<b>E</b>	<b>Tenants</b>	4. Other Tenants/Land Use Matters	II.E.4	\$0	\$0
		<b>Subtotal Tenants - II.E</b>		<b>\$0</b>	<b>\$0</b>
<b>F</b>	<b>RCRA/CAMU Compliance</b>	1. Reporting	II.F.1	\$2,000	\$500
		2. Inspections	II.F.2	\$2,000	\$500
		5. CAMU O&M/Leachate Collection & Disposal	II.F.5	\$490,900	\$122,725
		7. CAMU Leachate Design and Construction	II.F.7	\$226,700	\$0
		<b>Subtotal RCRA Compliance - II.F</b>		<b>\$721,600</b>	<b>\$123,725</b>
<b>I</b>	<b>Risk Assessments</b>	1. HHRA	II.I.1	\$0	\$0
		2. BERA	II.I.2	\$0	\$0
		<b>Subtotal Risk Assessments - II.I</b>		<b>\$0</b>	<b>\$0</b>
<b>J</b>	<b>RCRA Corrective Action Implementation</b>	<b>1. South Plant Hydraulic Control (SPHC) IM</b>	<b>II.J.1</b>		
		<b>a. SPHC IM Design</b>	<b>II.J.1.a</b>		
		7. PPC Realignment Permitting	II.J.1.a.7	\$289,000	\$0
		<b>Subtotal SPHC IM Design - II.J.1.a</b>		<b>\$289,000</b>	<b>\$0</b>
		<b>b. SPHC IM Construction</b>	<b>II.J.1.b</b>		
		9. PPC Realignment Construction	II.J.1.b.9	\$0	\$0
		10. Insurance	II.J.1.b.10	\$0	\$0
		<b>Subtotal SPHC IM Construction - II.J.1.b</b>		<b>\$0</b>	<b>\$0</b>
		<b>c. SPHC IM O&amp;M</b>	<b>II.J.1.c</b>		
		1. PPC Bypass O & M	II.J.1.c.1	\$0	\$0
		<b>Subtotal PPC Bypass O&amp;M - II.J.1.c</b>		<b>\$0</b>	<b>\$0</b>
		<b>Subtotal SPHC IM Design, Construction and O&amp;M - II.J.1</b>		<b>\$289,000</b>	<b>\$0</b>
		<b>2. ET Cover System IM</b>	<b>II.J.2</b>		
		<b>a. ET Cover System IM Design</b>	<b>II.J.2.a</b>		
		4. Stormwater Management/Permitting	II.J.2.a.4	\$0	\$0
		<b>Subtotal ET Cover System IM Design - II.J.2.a</b>		<b>\$0</b>	<b>\$0</b>
		<b>b. ET Cover System IM Construction</b>	<b>II.J.2.b</b>		
		9. ET Cover, ICS 2 and Phase 3 Demo Construction	II.J.2.b.9	\$0	\$0
		<b>Subtotal ET Cover System IM Construction - II.J.2.b</b>		<b>\$0</b>	<b>\$0</b>
		<b>c. ET Cover System O&amp;M</b>	<b>II.J.2.c</b>		
		1. ET Cover System/ICS O & M	II.J.2.c.1	\$0	\$0
		<b>Subtotal PPC Bypass O&amp;M - II.J.2.c</b>		<b>\$0</b>	<b>\$0</b>
		<b>Subtotal ET Cover System IM - II.J.2</b>		<b>\$0</b>	<b>\$0</b>

**Table 3 - Montana Environmental Custodial Trust East Helena Clean-Up Account - 1Q2019 Estimate**

**December 21, 2017**

Level 1 Cost Centers		Level 2 Cost Centers	Cost Code	2018 Final Budget	First Quarter 2019 Estimate
				2018 Budget Line Items Requiring Prior EPA Approval	2018 Budget Line Items Requiring Prior EPA Approval
		<b>4. IM/RCRA Support</b>	<b>II.J.4</b>		
		8. CMS Report Preparation	II.J.4.b.8	\$84,000	\$0
		<b>Subtotal IM/RCRA Support - II.J.4</b>		<b>\$84,000</b>	<b>\$0</b>
J	RCRA Corrective Action Implementation	<b>6. Corrective Measure Implementation</b>	<b>II.J.6</b>		
		a. CMI Work Plan	II.J.6.a	\$150,000	\$37,500
		b. Final Remedy Construction/Implementation	II.J.6.b		
		1. Design	II.J.6.b.1	\$220,000	\$55,000
		2. Construction/Implementation	II.J.6.b.2	\$5,000,000	\$2,000,000
		<b>Subtotal Final Remedy Construction - II.J.6.b</b>		<b>\$5,220,000</b>	<b>\$2,055,000</b>
		c. Corrective Measures O&M	II.J.6.c		
		1. PPC/PPC Bypass O & M	II.J.6.c.1	\$440,200	\$110,050
		2. ET Cover System/ICS O & M	II.J.6.c.2	\$190,000	\$47,500
		3. Speiss-Dross Slurry Wall O&M	II.J.6.c.3	\$0	\$0
		4. East Valley Controlled Groundwater Area (EVCGWA)	II.J.6.c.4	\$69,500	\$17,375
		5. Wilson Ditch O&M: Design and Implementation	II.J.6.c.5	\$128,700	\$32,175
		<b>Subtotal Corrective Measures O&amp;M - II.J.6.c</b>		<b>\$828,400</b>	<b>\$207,100</b>
		d. 2017 CAMP/Performance Monitoring	II.J.6.d		
		1. 2017 CAMP	II.J.6.d.1	\$250,800	\$62,700
		2. GW Strategy and Technical Support	II.J.6.d.2	\$102,500	\$25,625
		<b>Subtotal CAMP/Performance Monitoring - II.J.6.d</b>		<b>\$353,300</b>	<b>\$88,325</b>
		e. Long term Technical Planning/Support	II.J.6.e	\$50,000	\$12,500
		f. Residential Well Abandonment	II.J.6.f	\$176,000	\$44,000
		<b>Subtotal Corrective Measures Implementation - II.J.6</b>		<b>\$6,777,700</b>	<b>\$2,444,425</b>
		<b>7. Long-term Stewardship and O&amp;M</b>	<b>II.J.7</b>		
		a. Greenway Project	II.J.7.a	\$1,671,000	\$0
				<b>\$1,671,000</b>	<b>\$0</b>
		<b>Total All RCRA Corrective Action Implementation Design &amp; Construction - II.J</b>		<b>\$8,821,700</b>	<b>\$2,444,425</b>



**Table 3 - Montana Environmental Custodial Trust East Helena Clean-Up Account - 1Q2019 Estimate**

**December 21, 2017**

December 21, 2017						
Level 1 Cost Centers		Level 2 Cost Centers		Cost Code	2018 Final Budget	First Quarter 2019 Estimate
					2018 Budget Line Items Requiring Prior EPA Approval	2018 Budget Line Items Requiring Prior EPA Approval
K	Documents & Records	1. System Set-up	II.K.1	\$0	\$0	
		3. System Maintenance	II.K.3	\$18,000	\$4,500	
		Subtotal Documents & Records - II.K		\$18,000	\$4,500	
M	CERCLA Compliance	1. CERCLA/ROD Compliance	II.M.X	\$34,400	\$8,600	
		Subtotal CERCLA Compliance - II.M		\$34,400	\$8,600	
N	Financial Affairs	1. CPA Services	II.N.1	\$30,000	\$7,500	
		2. Design and Construction Audit Service	II.N.4	\$60,000	\$15,000	
		Subtotal Financial Affairs - II.N		\$90,000	\$22,500	
O	Redevelopment	1. Redevelopment Plans	II.O.1	\$0	\$0	
		2. Redevelopment Technical Support	II.O.2	\$10,000	\$0	
		3. Redevelopment Issues	II.O.3	\$5,000	\$1,250	
		Subtotal Redevelopment - II.O		\$15,000	\$1,250	
P	Community Relations	1. General Meetings	II.P.1	\$3,000	\$750	
		2. RCRA Annual Public Meeting	II.P.2	\$3,000	\$750	
		3. East Helena Website	II.P.3	\$7,500	\$1,875	
		5. Other CR activities	II.P.5	\$41,000	\$10,250	
		Subtotal Community Relations - II.P		\$54,500	\$13,625	
R	Legal Support	1. Outside Council Fees & Expenses	II.R.1	\$15,000	\$3,750	
		2. In-house Legal Services	II.R.2	\$41,200	\$10,300	
		Subtotal Legal Support - II.R		\$56,200	\$14,050	
T	Trust Project Management	4. GW and PPC Project Management	II.T.4	\$56,000	\$14,000	
		6. Compliance Manager	II.T.6	\$13,700	\$3,425	
		7. Operations Manager	II.T.7	\$41,100	\$10,275	
		8. Operations Support Specialist	II.T.8	\$27,000	\$6,750	
		9. Project Controls/Financial Affairs Coordinator	II.T.9	\$115,400	\$28,850	
		11. Trustee Management EH Clean Up	II.T.11	\$141,600	\$35,400	
		12. Trustee Land Use & Re-use	II.T.12	\$29,500	\$7,375	
		13. Trustee Travel and Directs	II.T.13	\$12,000	\$3,000	
		14. Project Management/LT Stewardship Oversight	II.T.14	\$76,400	\$19,100	
		Subtotal Trustee Management - II.T		\$512,700	\$109,075	
Total Budget - East Helena Cleanup Account:				\$10,432,600	\$2,768,875	
Total Amounts That Require Prior EPA Approval:				\$6,859,700	\$2,047,175	
Final Budget East Helena Cleanup Account Excluding Amounts That Require Prior EPA Approval:				\$3,572,900	\$721,700	